

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Digital Audio Broadcasting Systems)	MM Docket No. 99-325
And Their Impact on the Terrestrial)	
Radio Broadcast Service)	

**COMMENTS OF
WESTERN INSPIRATIONAL BROADCASTERS, INC.**

Western Inspirational Broadcasters, Inc. ("WIBI") respectfully submits these comments in response to the Federal Communications Commission's ("Commission's") Further Notice of Proposed Rulemaking and Notice of Inquiry ("FNPRM") in the above captioned proceeding concerning the final operational requirements and related broadcast licensing and service rule changes for digital audio broadcasting ("DAB") systems.

WIBI is a non-profit non-commercial educational broadcaster operating three full-service primary FM stations, and 42 FM translators serving over 100 small towns and communities in four states in the intermountain west. Our translator service utilizes both commercial and non-commercial frequencies.

We take this opportunity to submit comments specifically relating paragraphs 54 and 55 of the Commission's FNPRM.

Although sufficient technical testing of IBOC digital delivery via FM translator has not yet been accomplished, it is clearly evident from Ibiquity's data that the low power levels employed will restrict the ability of distant translators to receive IBOC encoded signals for retransmission to isolated rural communities, as is now accomplished with the analog Translator service. WIBI's network employs primary station to translator distances up to 300 km, and translator to translator hops of up to 168 km. In the analog world, we have been able to achieve consistent, reliable service beyond the radio horizon of the primary station(s), and in cases of terrain blockage, by taking advantage of the phenomenon known as the "knife edge" effect. This will not be possible with an IBOC signal. We propose that the Commission incorporate rules which will allow for the indefinite continuation of analog delivery via FM translator, and relax the restrictions on the method of signal distribution to all FM translators operating in a non-commercial mode, in both the reserved and non-reserved portions of the FM band.

We do not believe the use of alternate delivery means will have any affect on broadcast

localism. It is our contention that whether or not local issues are addressed is primarily a reflection of the programming philosophy of station management. If there is a commitment to local programming, it will be accomplished, whether the primary station is 30 or 3000 miles away. Our organization has been effectively addressing local issues at licensed facilities located from 30 to 1200 miles distance from the primary station. Through the use of local contacts via telephone interviews, national wire service regional and local reporting, and numerous services available on the World Wide Web, programming personnel are able to identify and produce programming which is responsive to local issues. This programming is presented in such a way as to be compatible with regional audiences. We do not believe there should be any limits to the delivery of the signal to FM translators.

Until definitive testing relating to the ability of FM translators to adequately receive and transmit an IBOC signal is completed, and appropriate equipment is available, WIBI does not believe it would serve the public interest to require the simultaneous conversion of translators when a main signal is converted to IBOC. Not only are their technical issues involved, but the added equipment necessary may, in many cases for listener supported licensees, be cost prohibitive. The remoteness of many FM translator locations may dictate that continued service to the public can only be provided through a continuation of analog transmission, unless alternate signal delivery to the site is approved.

WIBI would encourage the Commission to adopt flexible measures which would allow for the smooth transition to IBOC in the FM translator service, and the incorporation of rules which would allow for the reception of high-quality signals, free of noisy, interfering signals so as to continue this much needed service to the communities of rural America.

Respectfully submitted,

Western Inspirational Broadcasters, Inc.